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December 12, 2008

VIA ECF

The Honorable A. Kathleen Tomlinson
United States District Magistrate Judge
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: Kevin Hughes and Allison Hughes v. Bank of America, N.A.
successor by merger to Fleet National Bank; Trans Union, LLC
and NCO Financial
Docket No.: CV 08 0883 Bianco, J./Tomlinson, M.J.

Dear Magistrate Tomlinson:

We represent Bank of America in this action. Counsel for plaintiffs Kevin Hughes and Allison Hughes and counsel for defendant Bank of America jointly request that the deadline for the parties to respond to first requests for production of documents and first requests for interrogatories be extended 30 days from January 12, 2008 to February 11, 2008. The parties are attempting to avoid the cost of formally responding to interrogatories and document demands and exploring the possibility of an amicable resolution. Thus, additional time is needed for the parties to exchange documents informally and then to meet to discuss possible resolution of the case. There have been no previous requests for extensions of this deadline.

Respectfully submitted,

/s/ Thomas E. Stagg

Thomas E. Stagg (ts-0663)

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United States District Court
Eastern District of New York
December 12, 2008
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cc: Joseph Mauro, Esq.
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VIA ECF
